

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DINOSAUR FINANCIAL GROUP, LLC,	:	
HILDENE CAPITAL MANAGEMENT,	:	
LLC, and SWISS LIFE INVESTMENT	:	
MANAGEMENT HOLDING AG on behalf	:	
of themselves and all others similarly	:	
situated,	:	
	:	
Plaintiffs,	:	
	:	Case No. 1:22-cv-1860-KPF
-against-	:	
	:	
S&P GLOBAL, INC., AMERICAN	:	
BANKERS ASSOCIATION, and FACTSET	:	
RESEARCH SYSTEMS INC.,	:	
	:	
Defendants.	:	
	:	
	X	

**STIPULATION AND [PROPOSED] ORDER REGARDING CLASS DISCOVERY AND
AMENDED SCHEDULE**

WHEREAS, on January 6, 2025, Plaintiffs stated they intend to amend their Class Definition to include certain entities that signed Distribution Agreements. *See* ECF No. 167-1 at 4.

WHEREAS, during the March 3, 2025 conference, the Court ruled that it would permit Plaintiffs to seek to certify their amended class and Defendants raised that, as a result, they would need an opportunity for discovery regarding Plaintiffs' amended class.

WHEREAS, since the March 3, 2025 conference, the Parties have met and conferred through multiple videoconferences and emails to reach agreement on a schedule that would permit Defendants to take discovery on the amended class, while minimizing any delays to the briefing schedule for class certification.

WHEREAS, fact discovery ended on March 14, 2025, pursuant to the Court's Case Management Order. *See* ECF No. 116.

WHEREAS, pursuant to prior agreements between the Parties, certain depositions that were noticed prior to the end of fact discovery but which, for good reason, were unable to occur before March 14, 2025, are now scheduled and will be completed within the next 30 days.

IT IS THEREFORE STIPULATED AND AGREED AMONG THE PARTIES that,

1. The remaining 30(b)(1) deposition(s) previously noticed and agreed between the parties will be completed by **April 11, 2025**.

2. The remaining 30(b)(6) depositions previously noticed will be completed by **April 18, 2025**.

3. **By April 25, 2025**, Plaintiffs will provide Defendants with their amended class definition with the stipulation that the class definition in their motion to certify will either be the same or more restricted but shall not be more expansive. Plaintiffs represent that the class definition will not be a broad catchall placeholder class of every entity which signed a Distribution Agreement but will represent in good faith the class for which they intend to seek certification, subject to any narrowing in light of ongoing discovery.

4. Following receipt of that class definition, Defendants will be permitted a 90-day period, **until July 24, 2025**, to take fact discovery limited to issues arising from that amended class definition (i.e., the class of distributors), that will include but not be limited to obtaining discovery from up to 20 additional absent class members, with the number of absent class members from whom discovery is taken to be reasonably tailored to the class definition provided by Plaintiffs. Plaintiffs agree to meet-and-confer in good faith if, after receiving the amended

class definition on April 25, 2025, Defendants believe discovery is reasonably needed from additional absent class members.

5. Plaintiffs may cross-notice any deposition noticed by the Defendants but shall not otherwise be entitled to serve discovery (e.g., requests for production, interrogatories, requests for admissions) not otherwise allowed by the current Case Management Order. However, should an unexpected issue arise during this additional discovery period about which Plaintiffs wish to take additional limited discovery, narrowly tailored to issues arising from the amended class definition, the Parties will meet and confer in good faith on Plaintiffs' requested discovery.

6. The schedule set forth in the Case Management Order, ECF No. 116, shall further be amended as follows:

- a. Plaintiffs' motion for class certification and supporting expert reports are due **August 14, 2025;**
- b. Defendants' deadline to depose Plaintiffs' class certification experts is **September 24, 2025;**
- c. Defendants' opposition to class certification, including any motions to exclude expert testimony, relating to class certification and supporting expert reports are due **November 12, 2025;**
- d. Plaintiffs' deadline to depose Defendants' class certification experts is **December 23, 2025;**
- e. Plaintiffs' reply in support of class certification, including any motions to exclude expert testimony relating to class certification is due **January 12, 2026.**

SO STIPULATED:

Dated: March 20, 2025.

/s/ Ronald J. Aranoff

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similarly situated*

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*Attorneys for Defendant American
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SO ORDERED.

Dated: _____
New York, New York

Katherine Polk Failla
United States District Judge